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10 *Attorneys for Plaintiff,*

11 David Mitre

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE**
14 **EASTERN DISTRICT OF CALIFORNIA**

15 **DAVID MITRE,**

16 Plaintiff,

17 v.

18 **WAKEFIELD AND**
19 **ASSOCIATES, LLC,**

20 Defendant.

21 **Case No.: 1:22-cv-00884-ADA-BAM**

22 **JOINT STIPULATION**
23 **TO EXTEND TIME FOR PARTIES**
24 **TO FILE FOR DISMISSAL &**
25 **~~PROPOSED~~ ORDER**

26 **CURRENT DISMISSAL**
27 **DOCUMENTS FILING DEADLINE:**
28 **AUGUST 21, 2023**

29 **NEW DISMISSAL DOCUMENTS**
30 **FILING DEADLINE: OCTOBER 20,**
31 **2023**

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39 **STIPULATION TO EXTEND TIME FOR PARTIES TO FILE FOR DISMISSAL**

1 **IT IS HEREBY STIPULATED AND AGREED** to by Plaintiff Harout
2 Handian and Defendant Wakefield and Associates, LLC that:

3 1. On April 26, 2023, Plaintiff filed a Notice of Settlement.
4 2. On July 7, 2023, the Parties requested additional time to finalize the settlement
5 agreement, and asked the Court to extend the deadline to file the appropriate
6 dispositional documents to July 7, 2023.
7 3. The Parties have finalized the settlement agreement. However, due to
8 unforeseen delays, no formal agreement has been signed yet by Defendant.
9 4. The Parties seek additional time to file the correct dispositional documents.
10 Good cause exists for the proposed extension of this deadline because Plaintiff
11 and Defendant both require additional time in order to fulfil their obligations to
12 the settlement agreement.
13 5. The Parties request that the deadline for filing for dismissal be extended from
14 August 21, to October 20, 2023.

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16 **IT IS SO STIPULATED.**

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18 DATED: August 21, 2023

19 **THE CARDOZA LAW CORPORATION**
20 BY: /s/ LAUREN B. VEGGIAN
21 LAUREN B. VEGGIAN, ESQ.
ANGELY C. GAVIOLA, ESQ.
ATTORNEYS FOR PLAINTIFF
DAVID MITRE

22
23 DATED: August 21, 2023

24 **GORDON REES SCULLY**

25 **MANSUKHANI, LLP**

26 BY: /s/ SEAN P. FLYNN
27 SEAN P. FLYNN, ESQ.
ATTORNEY FOR WAKEFIELD AND
ASSOCIATES, LLC

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**STIPULATION TO EXTEND TIME FOR PARTIES TO FILE FOR DISMISSAL &
PROPOSED ORDER**

1 **ORDER**
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5 Pursuant to the stipulation of the Parties and good cause appearing, the parties
6 shall file for dismissal on or before October 20, 2023. The Court will not grant
7 further continuances, absent good cause, which will be narrowly construed.
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10 IT IS SO ORDERED.
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13 Dated: August 21, 2023

14 /s/ *Barbara A. McAuliffe*

15 UNITED STATES MAGISTRATE JUDGE
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